

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

No. 3:24-CR-00250-S

v.

KEITH J. GRAY (01)

THE UNITED STATES OF AMERICA’S WITNESS LIST

Pursuant to the Court’s orders (Dkts. 11 and 24), the United States, by and through the undersigned counsel, files this Witness List in advance of the February 24, 2025, trial.

	Witness Name (Probable or Possible)	Fact, Expert, or Record Custodian	Summary of Anticipated Testimony
1.	Armstrong, Betsy (Probable)	Fact	Betsy Armstrong was the bookkeeper for Parameno, the parent company for Gray’s laboratories, Axis and Kingdom, among other related businesses. Armstrong will testify regarding wire payments made to American Health Screening (“AHS”) at Gray’s direction, as well as the explanations Gray gave her for the payments.
2.	Cawthon, Don (Possible)	Fact	Don Cawthon, a Sergeant with the Medicaid Fraud Control Unit, Texas Office of Attorney General, participated in the investigation in this case.
3.	Decker, Stephen (Probable)	Fact	Stephen Decker will testify about his role in the conspiracy as a so-called “sub-marketer” brought in by Scott Wohrman to obtain additional cardio genetic testing referrals for Gray’s laboratories.
4.	Deo, Rajat (Probable)	Expert	See Expert Disclosure, Dkts 33, 33-1, & 33-3.
5.	Duckwiler, Douglas (Possible)	Fact	Douglas Duckwiler, a Medicare beneficiary for whom cardio genetic testing was ordered by Gray’s laboratory, will testify he was contacted about

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			genetic testing, sent a saliva swab kit in the mail, never received results nor discussed them with his doctor, and subsequently lodged a complaint with law enforcement.
6.	Dudley, Corey (Probable)	Fact	Corey Dudley was a billing manager for Parameno-related entities, including Axis and Kingdom, and will testify regarding Gray's role in the claims selection and submission process.
7.	Farr, Trevor (Possible)	Fact	Trevor Farr, a part-owner of Parameno, may testify regarding his knowledge of the business relationship between Gray and AHS.
8.	Foster, Tanya (Possible)	Fact	Tanya Foster is a Medicare beneficiary for whom cardio genetic testing was ordered by Gray's laboratory. Foster will testify regarding how she was contacted and that she never received results nor discussed them with her doctor.
9.	Freese, William (Possible)	Fact	William Freese, a Special Agent with Health and Human Services – Office of Inspector General, participated in the investigation in this case.
10.	Harvey, Emily (Possible)	Fact	Emily Harvey is a Medicare beneficiary for whom cardio genetic testing was ordered by Gray's laboratory.
11.	Heneghan, David (Probable)	Fact	David Heneghan co-owned and operated AHS along with Scott Wohrman. Heneghan will testify about his role at AHS running business operations and tracking expenses, as well as AHS's business model.
12.	Moore, Curtiss (Possible)	Fact and Expert	Dr. Curtiss Moore is a cardiologist who may testify regarding signing an order for cardio genetic testing for a Medicare beneficiary for whom Gray's laboratory submitted claims to Medicare.

	Witness Name (Probable or Possible)	Fact, Expert, or Record Custodian	Summary of Anticipated Testimony
13.	Moore, Beatrice (Possible)	Fact	Beatrice Moore worked at Parameno as Gray's executive assistant and will testify regarding Axis and Kingdom business operations.
14.	Omar, Gizman (Possible)	Fact	Gizman Omar worked at Parameno as Gray's executive assistant and will testify regarding Axis and Kingdom business operations.
15.	Pittore, Carol (Possible)	Fact	Carol Pittore was employed by Open Med as a purported genetic counselor and may testify regarding business operations.
16.	Robinson, Marylee (Probable)	Fact	Marylee Robinson reviewed financial records and claims data in this case and will testify regarding summary exhibits pursuant to FRE 1006.
17.	Santone, Pamela (Possible)	Fact and Expert	Dr. Pamela Santone is a physician who may testify regarding an order for cardio genetic testing for a Medicare beneficiary for whom Gray's laboratory submitted claims to Medicare.
18.	Schwarm (Hull), Shauna (Probable)	Expert	<i>See Expert Disclosure, Dkts. 33, 33-1, & 33-2.</i>
19.	Sewell, Bradley (Probable)	Fact	Brad Sewell was a minority owner of Parameno who will testify about his involvement in the laboratory business and Gray's representations regarding the payments to AHS.
20.	Sewell, Robert Howard (Probable)	Fact	Howard Sewell was another minority owner of Parameno who will testify regarding his knowledge about the relationship with AHS.
21.	Shepard, Nicholas (Possible)	Fact	Nicholas Shepard, a Special Agent with the Federal Bureau of Investigation, participated in the investigation in this case.
22.	Singleton, Michael (Probable)	Fact	Michael Singleton is an accountant with Clifton Lawson Allen, LLP, and will

	Witness Name (Probable or Possible)	Fact, Expert, or Record Custodian	Summary of Anticipated Testimony
			testify regarding his knowledge of the process and underlying documentation utilized to prepare and file Gray's tax returns, including those for his laboratories, Axis and Kingdom.
23.	Standlee, Stephen (Probable)	Fact	Stephen Standlee worked as an IT specialist for Parameno, and he will testify regarding his knowledge of any software purchased from AHS.
24.	Straight, Richard (Possible)	Fact	Richard Straight, a part-owner of Parameno, may testify regarding his knowledge of the business relationship between Gray and AHS.
25.	Wohrman, Scott (Probable)	Fact	Scott Wohrman was an owner and operator of AHS and will testify to his role in the conspiracy, including relationship with Defendant. Wohrman, through AHS, received kickbacks from Gray in exchange for cardio genetic testing referrals.
26.	Wright, Bryan (Possible)	Fact	Bryan Wright, who worked at Parameno, may testify regarding his knowledge of the business relationship between Gray and AHS.
27.	Record Custodians (Possible)		Absent a defense stipulation, the government may be required to call records custodians to introduce business records pursuant to FRE 902(11) and 803(6) from the following entities, among others: Bank of America, Hancock Whitney Bank, Bank of the West, Bank of America, JP Morgan Chase Bank, Qlarant Integrity Solutions, Novitas Solutions, Fulgent Genetics, Parameno Health, Sewell Automotive, and Texas Vehicle Exchange.

(Continued on the next page.)

Respectfully submitted,

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